

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

<p>MOLDEX-METRIC, INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>3M COMPANY and 3M INNOVATIVE PROPERTIES COMPANY,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil No. 14-cv-01821 (JNE/LFN)</p> <p style="text-align: center;"><b>DECLARATION OF KATHERINE A. MOERKE IN SUPPORT OF MOLDEX’S MOTION TO AMEND ITS COMPLAINT TO CLAIM PUNITIVE DAMAGES</b></p>
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I, Katherine A. Moerke, declare as follows:

1. I am an attorney admitted to practice in the District of Minnesota and am one of the attorneys representing Plaintiff Moldex-Metric, Inc., in this matter.
2. Attached as Exhibit 1 is a true and correct copy of Moldex’s redlined proposed Amended Complaint.
3. Attached as Exhibit 2 is a true and correct copy of an email exchange between counsel for Moldex and 3M regarding Moldex’s proposed Amended Complaint, dated June 23-26, 2015.
4. Attached as Exhibit 3 is a true and correct copy of pages 1-3 of Moldex’s Answer in 3M’s prior patent lawsuit against Moldex (12-cv-00611), dated April 27, 2012.

5. Attached as Exhibit 4 is a true and correct copy of a document produced by 3M in 3M's prior patent lawsuit against Moldex with production numbers 3M00076142-43. (filed under seal)

6. Attached as Exhibit 5 is a true and correct copy of a document produced by 3M in 3M's prior patent lawsuit against Moldex with production number 3M00075927. (filed under seal)

Dated: July 1, 2015

By: s/Katherine A. Moerke  
Katherine A. Moerke